



San Diego County Water Authority

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July 13, 2010

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DEPARTMENT OF FISH & GAME
STATE OF CALIFORNIA

Ms. Lanika Cervantes
U.S. Army Corps of Engineers, Los Angeles District
Regulatory Division
ATTN: 2010-00142-LLC
6010 Hidden Valley Road, Suite 105
Carlsbad, CA 92011

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OTHER REPRESENTATIVE

County of San Diego

Re: Salton Sea Species Conservation Habitat Project (Public Notice/Application
No.: SPL-2010-00142-LLC)

Dear Ms. Cervantes:

The San Diego County Water Authority (Water Authority) is providing comments on the referenced Clean Water Act (33 U.S.C. 1344) Section 404 permit application submitted by the California Department of Fish and Game for creation of Salton Sea Species Conservation Habitat. The U.S. Army Corps of Engineers (Corps), in conjunction with the California Natural Resources Agency, is preparing an Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the construction of the Salton Sea Species Conservation Habitat (SCH) Project. The SCH project consists of the creation of a shallow habitat pond complex that would be constructed in phases depending on funding and land availability. Habitat would be constructed over multiple years, as the Sea recedes, until the targeted acreage was reached. It is currently anticipated that about 2,400 acres of habitat would be created as part of the SCH Project, although the actual acreage may vary depending upon the alternative selected.

As described in the public notice, the decision whether to issue a permit will be based on an evaluation of the probable impact, including cumulative impacts, of the proposed activity on the public interest. That decision will reflect the national concern for both protection and utilization of important resources and will balance the benefit that reasonably may be expected to accrue from the proposal against its reasonably foreseeable detriments. Factors relevant to the proposal that will be considered include conservation, economics, aesthetics, general environmental concerns, wetlands, cultural values, fish and wildlife values, flood hazards, flood plain values, land use, navigation, shoreline erosion and accretion, recreation, water supply and conservation, water quality, energy needs, safety, food production and, in general, the needs and welfare of the people. In addition, because the proposed action would discharge dredged or fill material into waters of the U.S., the evaluation will incorporate the U.S. Environmental Protection Agency's Section 404(b)(1) Guidelines (40 C.F.R. Part 230) as required by Section 404 (b)(1) of the Clean Water Act.

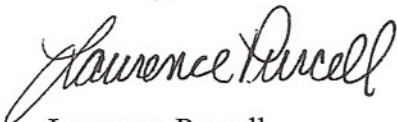
A public agency providing a safe and reliable water supply to the San Diego region

Issues identified for thorough evaluation in the EIS/EIR include agricultural resources, air quality, biological resources, cultural resources, environmental justice, geology and soils, greenhouse gas emissions/climate change, hazards and hazardous materials, hydrology and water quality, Indian Trust assets, land use, noise, paleontological resources, and transportation and traffic.

The Water Authority is a participant in the Colorado River Water Transfer and Quantification Settlement Agreement (QSA), which includes mitigation measures to address habitats and sensitive species associated with the Salton Sea. In 2001, the Water Authority's Board of Director's formally supported Salton Sea reclamation, including habitat conservation and enhancement projects, as long as those activities would not hinder timely implementation of the QSA. In this context, the Water Authority recommends that the EIS/EIR address all the issues listed above, with particular attention to potential effects on existing QSA agreements, land use policies and plans, water use/quality, biological resources, and air quality. Neither the proposed project nor any alternatives should conflict with the goals and objectives of the QSA, and should, pursuant to Fish and game Code Section 2932(b), be consistent with Salton Sea Restoration study requirements found in Fish and Game Code Section 2081.7.

Please keep the Water Authority apprised of future decisions and actions being considered by the Corps on this project. A copy of the draft EIS/EIR should be sent to the undersigned at the above address. If you have questions or wish to discuss these comments in greater detail, please contact me at (858) 522-6752 or lpurcell@sdewa.org

Sincerely,



Laurence Purcell
Water Resources Manager

cc: Ms. Kimberly Nichol, CDFG Bermuda Dunes